

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY )  
AVERAGE WHOLESALE PRICE )  
LITIGATION ) MDL No. 1456  
 ) Civil Action No. 01-12257-PBS  
 )  
 ) Hon. Patti B. Saris  
 )  
THIS DOCUMENT RELATES TO: ) Magistrate Judge Marianne B.  
 ) Bowler  
*United States of America, ex rel. Ven-a-Care* )  
*of the Florida Keys, Inc. v. Abbott* )  
*Laboratories, Inc.,* )  
CIVIL ACTION NO. 06-CV-1337-PBS )

**EXHIBIT E**  
**to**

**(PROVIDED IN CAMERA AND UNDER SEAL)**

**RELATORS' MEMORANDUM OF LAW IN SUPPORT OF ITS**  
**MOTION TO COMPEL ABBOTT LABORATORIES, INC TO**  
**PRODUCE OR CONSENT TO ACCESS TO AND SHARING OF ALL**  
**DISCOVERY PRODUCED BY ABBOTT IN OTHER FALSE PRICE**  
**REPORT LITIGATION**